IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT ILLINOIS EASTERN DIVISION

| Huntington National Bank, A National Banking Association, |) |
|---|---|
| Plaintiff, |) No. 1:14-CV-1455) Hon. Manish S. Shah |
| V. |) |
| Anne Szpindor and John Watson, individuals, Medical Providers, Inc., an Illinois Corporation, |))) |
| Defendants. |)) |

MOTION FOR PROVE UP OF DAMAGES FOR DEFAULT JUDGMENT

NOW COMES the Plaintiff, Huntington National Bank, a National Banking Association ("HNB"), by and through its attorneys, Simon LLC, and brings this Motion for Prove Up of Damages for Default Judgment. In support thereof, HNB states the following:

- 1. HNB filed a Motion for Entry of Default Judgment on October 15, 2014.
- 2. On November 4, 2014, this Court entered an Order granting HNB's Motion for Entry of Default Judgment against Defendants John Watson and Anne Szpindor and granted HNB leave of court to file a motion for prove up of a specific judgment amount by November 18, 2014.
- 3. Despite diligent efforts, HNB was unable to file the motion by November 18, 2014.
- 4. On January 12, 2015, HNB filed a Motion for Prove Up of Specific Judgment Amount. Unfortunately, page 2 was inadvertently omitted from the Affidavit of Thomas Caruso that was attached to and filed with the Motion.
- 5. On January 20, 2015, this Court granted Plaintiff leave of court to resubmit a motion for prove up of damages for default judgment by February 3, 2015.
- 6. As of February 3, 2015, the specific amount owed to Plaintiff is \$178,418.20. See Affidavit of Thomas Caruso attached as **Exhibit 1**.

WHEREFORE, Plaintiff HNB respectfully requests that this Court enter an Order of Default Judgment in the amount \$178,418.20 in favor of Plaintiff HNB and against Defendants John Watson and Anne Szpindor and grant such further relief as the Court deems appropriate.

Respectfully submitted,

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Dated: January 28, 2014

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT ILLINOIS EASTERN DIVISION

| Huntington National Bank, A National Banking Association, |) |
|---|---|
| Plaintiff, |) No. 1:14-CV-1455) Hon. Manish S. Shah |
| V. |) |
| Anne Szpindor and John Watson, individuals, Medical Providers, Inc., an Illinois Corporation, | |
| Defendants. |) |

DEFAULT JUDGMENT

This Cause Coming before the Court on Plaintiff Huntington National Bank, a National Banking Association's, Motion for Prove Up of Damages for Default Judgment against Defendants John Watson and Anne Szpindor, all Defendants having been served with the Complaint and having failed to file an answer or otherwise respond within the time required, due notice having been given, the Court having granted Plaintiff's Motion for Entry of Default against Defendants John Watson and Anne Szpindor and having entered an Order of Default against Defendants John Watson and Anne Szpindor on November 4, 2014, the Court instructing Plaintiff Huntington National Bank, a National Banking Association, to file a motion for prove up of specific judgment amount, and the Court being advised in the premises,

IT IS HEREBY ORDERED THAT:

 Plaintiff Huntington National Bank, a National Banking Association's, Motion for Prove Up of Damages for Default Judgment against Defendants John Watson and Anne Szpindor is granted; and 2. Default Judgment in the amount of \$178,418.20 is entered in favor of Plaintiff Huntington National Bank, a National Banking Association, and against Defendants John Watson and Anne Szpindor.

| Dated: | | | |
|--------|--|-------|--|
| | | Judge | |

Prepared by:
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